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EXECUTIVE SECRETARY

March 2, 2000

HAND DELIVERY

Mr. K. David Waddell
Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

**Re: Ardmore Telephone Company, Inc.
IntraLATA Dialing Parity Implementation Plan
Docket No. 99-00295**

Dear Mr. Waddell:

As per the Tennessee Regulatory Authority's (the "TRA"), Order of October 1, 1999, we are refiling an original and thirteen (13) copies of the IntraLATA Toll Dialing Parity Implementation Plan (the "Plan") of Ardmore Telephone Company, Inc. As directed, the Plan is being filed sixty days (60) prior to its implementation date of May 1, 2000.

If you have any questions, please do not hesitate to contact me or Mr. Terry Wales, General Manager of Ardmore Telephone Company, Inc. at (256)423-2131.

Very truly yours,



R. Dale Grimes

DRG/kl

Enclosures

cc. Mr. Joe Werner
Richard Collier, Esq.
Mr. Carsie Mundy
Mr. Terry M. Wales
Thomas J. Moorman, Esq.

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EXECUTIVE SECRETARY
**INTRALATA TOLL
DIALING PARITY
PLAN**

OFFICE OF THE
EXECUTIVE SECRETARY

Ardmore Telephone Company Inc.

ARDMORE, TENNESSEE

April 22, 1999

I. Purpose

Ardmore Telephone Company, Inc. (Ardmore) has described herein the process for implementing intraLATA toll dialing parity in the Ardmore exchanges located in the state of Tennessee. The intent of this Plan is to provide a proposal that, upon implementation, would provide customers the ability to select the participating telecommunications carrier of their choice for routing their intraLATA toll calls. Ardmore will associate with the 470 LATA for the purpose of toll dialing parity.

Ardmore Telephone Company, Inc. has been advised that under the rules and regulations of the Federal Communications Commission, it is considered a LEC, and the Federal Communications Commission ("FCC") has directed that no later than April 22, 1999, all LECs must file intraLATA toll dialing parity plans with the State Regulatory Commission (in Tennessee, the Tennessee Regulatory Authority) for each state in which the LEC provides telephone exchange service if a plan has not yet been filed with such state commission. Ardmore has not heretofore filed such a plan.

Concurrently with the filing of this plan, Ardmore is filing with the Tennessee Regulatory Authority (TRA) a petition for modification (petition) of the timeframes for implementation of toll dialing parity that was prescribed by the Federal Communications Commission (FCC) as well as the FCC's "default carrier rules". The May 1, 2000 date noted herein is based on the assumption that the TRA will approve Ardmore's petition for the reasons stated therein.

II. IntraLATA Environment

Ardmore customers in Tennessee in the Ardmore area can currently dial an access code to complete intraLATA toll calls to another carrier. After implementation of the intraLATA toll dialing plan, customers will be able to subscribe to the carrier of their choice for intraLATA as well as interLATA service (two-PIC subscription capability). Customers will dial 1+ the area code and number to complete calls using their subscribed carrier. If customers wish to complete a call using a carrier other than their subscribed carrier, they will need to dial the carrier's access code.

Each end office switch will be equipped with the capability of allowing each end user subscriber to select "no-PIC" as a valid intraLATA subscription selection. Customers selecting "no-PIC" as their subscribed carrier will not be able to make intraLATA toll calls on a 1+ or 0+ dialed basis. Such customer will need to dial an access code each time he or she makes an intraLATA call.

In 1992, toll-free intraLATA county-wide calling was initiated for all Local Exchange Carriers via an order from the Tennessee Public Service Commission. BellSouth currently maintains tax-code billing tables to identify "free-county-wide" intraLATA toll calls originated by Ardmore intraLATA toll customers and to ensure that billing does not occur on these calls. Ardmore will continue to process toll-free intraLATA county-wide calls in this manner for toll customers after implementation of intraLATA toll dialing as long as technically feasible.

III. Implementation Schedule

The Company will implement toll dialing parity, subject to TRA's approval of this IntraLATA Toll Dialing Parity Plan, as outlined below:

IV. Carrier Selection Procedures (continued)

Existing Customers

Currently, the Local Exchange Carrier is the only subscribed intraLATA toll provider for existing customers in Ardmore's local exchange area. In accordance with the implementation schedule, customers may subscribe to any telecommunications carrier offering intraLATA toll service in their exchange. Customers will remain with the BellSouth until they affirmatively choose an intraLATA toll carrier. Customers may make this selection through their own initiative or as a result of the promotional marketing activities of participating intraLATA toll telecommunications carriers. Customers may communicate their choice of carriers to Ardmore directly or through their selected carriers.

Customers will be assessed a PIC change charge for changing their intraLATA carrier at a rate of \$5.00. When customers request a simultaneous change to the same carrier for their interLATA and intraLATA service, Ardmore will assess two PIC charges, one from the interstate tariff and one from the intrastate tariff.

New Installation Customers

Ardmore customer contact representatives will be provided discussion guidelines that will provide a new customer with the following information:

1. Inform the customer that a choice of intraLATA toll providers is now available to him or her.
2. Offer to read the customer a list of available carriers in randomly generated order.
3. Advise the customer that various carriers provide intraLATA toll service.

Customers who do not make a positive choice for an intraLATA toll carrier will be notified that they will not be automatically defaulted to a carrier and will be required to dial an access code to place intraLATA toll calls until they make an affirmative choice for an intraLATA toll carrier.

PIC Charge Waiver Period

Customers will be given a period of ninety (90) days within which to make one change of their preferred carrier at no cost to the customer. This waiver period will begin on the date of customer notification. The costs associated with this waiver will be recovered through the general cost recovery mechanism.

V. Customer Education/Notification

Customers will receive information explaining their opportunity to select an intraLATA carrier a minimum of 30 days in advance of the offering of intraLATA toll dialing parity via a bill message. In addition, during the 30 days following implementation of intraLATA toll dialing parity, customers will receive a bill insert also explaining their opportunity to select an intraLATA carrier. Ardmore anticipates that promotional strategies by carriers will contribute to customer awareness of intraLATA toll dialing parity. Customer telephone directories will be updated as new editions are published to reflect the opportunity for customers to choose an intraLATA toll carrier.

VI. Carrier Notification

Current interexchange carriers will be notified of Ardmore intraLATA toll dialing parity approval via Certified U.S. Mail two months prior to implementation. Carriers that currently participate in interLATA toll will be assumed to be participants in the intraLATA toll market. Certified carriers who enter the market after implementation will be added to the list of participating carriers within 30 days of notifying Ardmore.

VII. Operator Services and Directory Assistance

Access to Operator Services and Directory Assistance will continue to be available through the customer's local exchange carrier or interLATA carrier. No industry standard exists for access to Operator Services and Directory Assistance unique to intraLATA services. For Operator Services, customers dial "0" to reach their local exchange operator and "00" to reach their interLATA operator. For Directory Assistance, customers dial "1-411" for accessing the local exchange Directory Assistance and dial "1-NPA-555-1212" for accessing their interLATA carrier's Directory Assistance.

VIII. Cost Recovery

In accordance with 51.215 of FCC Order 96-333, CC Docket No. 96-98, cost recovery for the incremental cost of dialing parity, specific switch software, and necessary hardware and signaling system upgrades, and customer education costs that are strictly necessary to implement dialing parity, will be implemented in a competitively neutral manner across all providers of telephone exchange service and telephone toll service in the area served by Ardmore. Incremental costs will be recovered from all carriers through a rate element based upon originating intrastate intraLATA switched access minutes of use (MOUs) during the four (4) year cost recovery period. Attached, as Exhibit B, is a detailed explanation of the Cost Recovery methodology. An annual true-up will be conducted and reported to the TRA. Because the incremental costs associated with the provision of intraLATA dialing parity has yet to be identified fully, the attached Exhibit B is an explanation of the detailed cost methodology only. Ardmore will file for approval with the TRA, an Equal Access Impact Recovery Plan that will be developed and implemented in coordination with IntraLATA Presubscription.

IX. Statement of Compliance

Ardmore Telephone Company, Inc. will comply with all rules of the Federal Communications Commission and the Tennessee Regulatory Authority.

Executed as of the 22nd Day of April, 1999



Terry M. Wales
General Manager of the Ardmore Telephone Company, Inc.
P. O. Box 549
Ardmore. Tn. 38449
Phone: (256) 423-2131

BILL MESSAGE

"Ardmore will implement local toll 1+ subscription service on TBD. You are now able to choose a local toll provider. Your current carrier will continue to provide this service for you or you may select another carrier. You may select the same provider as your interstate long distance service provider or you may select a different provider for each service. Your first selection prior to TBD will be at no charge.

NEWSLETTER

IMPORTANT NOTICE ABOUT LOCAL TOLL SERVICE

"As of TBD, you are able to choose your provider of "1+" local toll service. This change allows you to remain with your current carrier or select a different long distance carrier for local toll calls. Please refer to the information pages in the front of your Ardmore Telephone Directory under "Long Distance-Calling Area" for a description of your local toll calling area.

If you would like to select a different carrier for your "1+" local toll service, you should contact that company. No action is necessary to keep your current provider for these local toll calls.

From TBD until TBD you will be able to change your local toll carrier one time without charge. There may be a charge for each subsequent change you make in local toll companies."

Note: TBD-To Be Determined after approval of the Tennessee Regulatory Authority in accordance With the implementation schedule in the IntraLATA Dialing Parity Plan.

TENNESSEE
METHODOLOGY FOR RECOVERY OF COSTS
ASSOCIATED WITH
IMPLEMENTATION OF INTRALATA SUBSCRIPTION
CALCULATION OF INITIAL EQUAL ACCESS RATE ELEMENT

Step 1: Identify the estimated total incremental costs directly attributable to the provisioning of IntraLATA Subscription. Incremental costs include the following items:

- a) network hardware upgrades to provide the full 2-PIC methodology in all exchanges
- b) central office software upgrades
- c) software translations
- d) system programming/testing
- e) training for Business Office, Marketing, Carrier Services, Customer Services, and Service Center personnel
- f) customer notification (bill message, newsletter and special mailing)
- g) implementation activity - administrative costs
- h) PIC change charge waiver

\$XXX

Step 2: Identify estimated total Intrastate/IntraLATA minutes of use for the 4 year recovery period.

XX,XXX,XXX

Step 3: Calculate a cost recovery rate by dividing amount in Step 1 by the Minutes of Use in Step 2.

\$0.000XXX

ANNUAL TRUE-UP OF EQUAL ACCESS RATE ELEMENT

Repeat Steps 1 through 3 and calculate an updated access rate element by dividing amount in Step 1, adjusted by the previous year/years cost recovery.